

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
ARROWOOD INDEMNITY COMPANY,  
a Delaware corporation, as successor in interest to  
Security Insurance Company of Hartford,  
a foreign corporation,

Index No.: 08-CV-6153 (SHS) (RLE)

*Plaintiff,*

- against -

GIBSON & BEHMAN, P.C., a Massachusetts  
professional corporation,

*Defendants.*  
-----X

**NOTICE OF MOTION**

Please take notice, that the Plaintiff, ARROWOOD INDEMNITY COMPANY, by their attorneys, LEAHEY & JOHNSON, P.C., upon the affirmation of Brian Casey, and all exhibits thereto, will bring a motion at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, seeking an Order allowing the admission *pro hac vice* of:

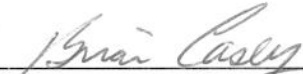
Gary A. Grasso, Esq. (IL. ARDC # 3121760)  
Adam R. Bowers, Esq. (IL. ARDC # 6277163)  
GRASSO BASS & WILLIAMS, P.C.  
760 Village Center Drive, Suite 200  
Burr Ridge, IL 60527  
(630) 654-4500  
(630) 455-4646 Facsimile

Dated: New York, New York  
August 13, 2008

Yours, etc.,

LEAHEY & JOHNSON, P.C.

Attorneys for Plaintiff  
ARROWOOD  
INDEMNITY COMPANY  
120 Wall Street, Suite 2220  
New York, New York 10005  
(212) 269-7308

BY:   
Brian Casey, Esq. (7548)  
bcasey@leaheyandjohnson.com

TO:

ABRAMS, GORELICK, FRIEDMAN & JACOBSON, P.C.  
Attorneys for Defendant  
GIBSON & BEHMAN, P.C.  
One Battery Park Plaza – Fourth Floor  
New York, New York 10004  
(212) 422-1200

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**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

1. PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Brian Casey, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Gary A. Grasso, Esq. (IL. ARDC # 3121760)  
Adam R. Bowers, Esq. (IL. ARDC # 6277163)  
GRASSO BASS & WILLIAMS, P.C.  
760 Village Center Drive, Suite 200  
Burr Ridge, IL 60527  
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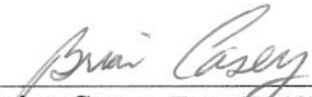
2. Applicants Gary A. Grasso and Adam R. Bowers are members in good standing of the Bar of the States of Illinois and the Bar of the United States Court for the Northern District of Illinois. A copy of their Certificates of Good Standing issued by the Clerk of the United States Court for the Northern District of Illinois within the past 30 days are attached hereto and made a

part hereof as Exhibits "A" and "B", respectively. There are no pending disciplinary proceedings against Gary A. Grasso and Adam R. Bowers in any State or Federal court. A copy of my affidavit attesting that Applicants Gary A. Grasso and Adam R. Bowers are suitable candidates for admission *pro hac vice* is attached hereto and made a part hereof as Exhibit "C".

Dated: New York, New York  
August 13, 2008

Yours, etc.,

LEAHEY & JOHNSON, P.C.  
Attorneys for Plaintiff  
ARROWOOD  
INDEMNITY COMPANY  
120 Wall Street, Suite 2220  
New York, New York 10005  
(212) 269-7308

BY:   
Brian Casey, Esq. (7548)  
bcasey@leaheyandjohnson.com

## CERTIFICATE OF GOOD STANDING



*United States of America*

} ss. Gary A. Grasso

*Northern District of Illinois*

I, Michael W. Dobbins, Clerk of the United States District Court  
for the Northern District of  
Illinois,

DO HEREBY CERTIFY That Gary A. Grasso  
was duly admitted to practice in said Court on (12/14/1978)  
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois  
on (08/07/2008 )

Michael W. Dobbins, Clerk,

By: Liri Isufi  
Deputy Clerk

A handwritten signature in black ink, appearing to read "Liri Isufi", written over the printed name of the Deputy Clerk.

## CERTIFICATE OF GOOD STANDING



*United States of America*

}ss. Adam Raymond Bowers

*Northern District of Illinois*

I, Michael W. Dobbins, Clerk of the United States District Court  
for the Northern District of  
Illinois,

DO HEREBY CERTIFY That Adam Raymond Bowers  
was duly admitted to practice in said Court on (12/19/2002)  
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois  
on (08/07/2008 )

Michael W. Dobbins, Clerk,

By: Liri Isufi  
Deputy Clerk

A handwritten signature in black ink, appearing to read "Liri Isufi", written over a horizontal line.



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State of New York )

)

ss:

County of New York )

**AFFIDAVIT OF BRIAN CASEY  
IN SUPPORT OF MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

Brian Casey, Esq., being duly sworn, hereby deposes and says as follows:

1. I am a senior associate of the law firm, Leahey & Johnson, P.C., local counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Gary A. Grasso and Adam R. Bowers as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on July 26, 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Gary A. Grasso and Adam R. Bowers since 2008.

4. Mr. Grasso is a founding partner of Grasso, Bass & Williams, P.C., in Burr Ridge, Illinois. Mr. Bowers is an associate of the same firm.

5. I have found Mr. Grasso and Mr. Bowers to be skilled attorneys and persons of integrity. They are experienced in federal practice and are familiar with the Federal Rules of Procedure.

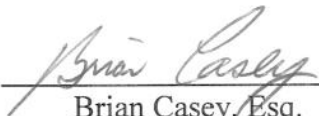
6. Accordingly, I am pleased to move the admission of Gary A. Grasso and Adam R. Bowers, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Gary A. Grasso and Adam R. Bowers, *pro hac vice*, which is attached hereto and made a part hereof as Exhibit "D".

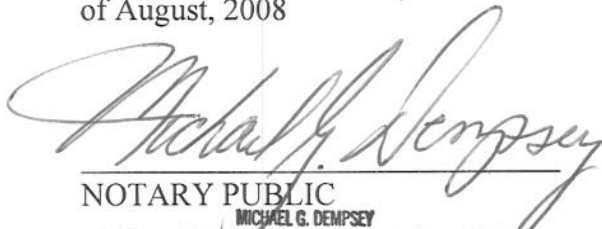
WHEREFORE it is respectfully requested that the motion to admit Gary A. Grasso and Adam R. Bowers, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: New York, New York  
August 13, 2008

Yours, etc.,

  
Brian Casey, Esq.

Sworn to before me this 13<sup>th</sup> day  
of August, 2008

  
NOTARY PUBLIC  
MICHAEL G. DEMPSEY  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 5006171  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES DEC. 28, 2008 2010



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*Defendants.*  
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**ORDER FOR ADMISSION PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Brian Casey, Esq., attorney for Plaintiff, and said sponsor attorney's affidavit in support, IT IS HEREBY ORDERED that:

Gary A. Grasso, Esq. (IL. ARDC # 3121760)  
Adam R. Bowers, Esq. (IL. ARDC # 6277163)  
GRASSO BASS & WILLIAMS, P.C.  
760 Village Center Drive, Suite 200  
Burr Ridge, IL 60527  
(630) 654-4500  
(630) 455-4646 Facsimile

are admitted to practice *pro hac vice* as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of the this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:  
New York, New York

\_\_\_\_\_  
United States District/Magistrate Judge